



# Lamb Communication Services

August 10, 2005

Marlene H. Dortch, Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

RE: **Subscriber Notification Report** submitted on behalf of WestCom LLC dba WesTelFiber in WC Docket No. 05-196, *E911 Requirements for IP-Enabled Service Providers*. FRN 0007594153

Dear Ms. Dortch;

Please accept this Subscriber Notification Report on behalf of WestCom LLC dba WesTelFiber (fka Digital Easy Chair) FRN 0007594153.

WesTelFiber provides stationary VoIP and Internet services to its customer base via facilities-based fiber broadband connections between themselves and their customer's premises.

WesTelFiber has always provided its customers with access to E911 Emergency Services through facilities purchased from other providers in its service area. Additionally, WesTelFiber contracts with a third party ALI/ANI database provider to maintain the accuracy of its customer location information.

Please accept the following **Subscriber Notification Report** as an indication of WesTelFiber's compliance with your Order in WC Docket No. 05-196.

**1. A detailed description of the actions performed by WesTelFiber to inform every subscriber of record of the limitations of its Voice Over Internet Protocol service**

WesTelFiber has prepared and mailed a letter to their subscribers detailing the limitations of their VoIP offering and requesting the subscriber provide an affirmative acknowledgement of their understanding and acceptance of the limitations, in order to prevent the disconnection of their VoIP service. The affirmative acknowledgement form and a self-addressed stamped envelope have been included with the letter.

The letter was sent on August 5, 2005 to every current subscriber on record with the August invoices for service. The letter is clearly marked as "Important Notice to our Customers" and "Your Response is Required". The letter includes a brief background to explain why it is being sent and what is required pursuant to the Order.

WesTelFiber provides the following instances when E911 Emergency Services may not be available:

1. Power outage. WesTelFiber includes an explanation of the battery back up for 5 hours that is provided.
2. Fiber Optic cable cut
3. (a) Service not activated yet or (b) E911 data base not updated yet
4. A Force Majeure event beyond WesTelFiber's control

WesTelFiber continues to advise its customers that affirmative acknowledgement of their understanding and acceptance is required and is to be returned in the envelope provided for that purpose prior to August 30, 2005 to prevent disconnection of their VoIP service. The number for Customer Service has been prominently displayed to call if customers have questions.

A copy of WesTelFiber's notification letter, affirmative acknowledgement statement and labels are attached as Exhibit 1.

## **2. Information on the percentage of affirmative acknowledgements returned and an estimate of the percentage that will not be returned.**

As of the date of this report, no affirmative acknowledgements have been returned (0%). The notification letters were mailed with the customer's statements on August 5, 2005 and are just now being received by them. It is anticipated that acknowledgements will begin to be received by next week.

WesTelFiber has a very small base of customer's and we anticipate that 100% of the acknowledgements sent will be returned.

## **3. A detailed description of whether and how warning stickers or labels have been distributed to subscribers**

In addition to the notification letter and the affirmative acknowledgement, WesTelFiber also included with the notification letter, 6 labels with instructions for the customer to place them on or near their phones and the terminating equipment. The notification letter, acknowledgement and labels were mailed with the customer invoices, using US Mail, on August 5, 2005.

New subscribers are advised of the limitations of WesTelFiber's VoIP service and required to sign the affirmative acknowledgement before service is provided. Warning labels are provided to the customer when service is contracted for.

A copy of WesTelFiber's notification letter, affirmative acknowledgement statement and labels are attached as Exhibit 1.

## **4. Information of the percentage of subscribers who were not sent the advisory or warning stickers and/or labels.**

100% of WesTelFiber's customers of record were sent warning stickers and/or labels with instructions of where to place them. New subscribers are provided warning stickers and/or labels when service is contracted for.

## **5. Information as to what actions WesTelFiber will take towards subscribers that do not affirmatively acknowledge their understanding and accept the limitations of the VoIP service they receive by returning the acknowledgement.**

All acknowledgements are being tracked as they are received in an excel spreadsheet. In addition, WesTelFiber is following up with emails and calls to their subscribers prior to August 30<sup>th</sup> and before taking the drastic action of disconnecting any subscriber. Many subscribers may be on vacation or otherwise out of town and unable to respond promptly.

Since WesTelFiber provides stationary (not mobile) VoIP service, our subscribers have access to E911 Emergency Services already. Additionally, we provide a five (5) hour battery back up to the terminating equipment. WesTelFiber feels that no customer should be disconnected without first having an opportunity to talk to them. To

this end, WesTelFiber will make personal contacts with every customer at their premise prior to disconnecting their service on August 30<sup>th</sup>.

All action taken to contact the customer will be noted in their file.

**6. A detailed description of how returned affirmative acknowledgements are maintained.**

All returned affirmative acknowledgements are being placed in the customer's permanent file. In addition, a copy of all emails sent to the customer regarding the return of their affirmative acknowledgements are being copied and kept in the customer's permanent file. Attempts to contact the customer and conversations with the customer are being document.

**7. Compliance contact details**

Sandra Young  
Telecom Services Manager  
SolutionPro, Inc.  
1450 Eagle Flight Way  
Boise, ID 83709

Voice (208) 493-2030  
Email: [syoung@s-pro.net](mailto:syoung@s-pro.net)

Respectively submitted,

A handwritten signature in black ink, appearing to read "Susan Lamb". The signature is fluid and cursive, with the first name "Susan" and last name "Lamb" clearly distinguishable.

Susan Lamb  
Lamb Communication Services  
111 Teal Ln  
Sagle, ID 83860

## Exhibit 1

Subscriber Notification Letter  
with  
Affirmative Acknowledgement  
and  
Warning Labels

**\*\*IMPORTANT NOTICE TO OUR CUSTOMERS\*\***  
**YOUR RESPONSE IS REQUIRED**

August 5, 2005

Dear WesTelFiber Customer,

At WesTelFiber we are pleased to offer our Customers access to advanced and innovative voice and data services over our fiber optic network. WesTelFiber's Voice over Internet Protocol, referred to as VoIP, allows you to receive advanced voice services and functionality for a fraction of the cost of traditional voice service while also having access to broadband Internet service over the same fiber optic connection. We are very excited about our VoIP services because it offers more features, cheaper rates, and the convenience of one easy-to-read bill.

On June 3, 2005, the Federal Communications Commission (FCC) released an Order (*IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers*) in which they required VoIP providers to provide access to E911 Emergency Services no later than 120 days from July 29, 2005. Additionally, the FCC required that all VoIP providers notify their Customers of any circumstances under which E911 service may not be available, or may be limited in comparison to traditional E911 service. The FCC also required VoIP providers to receive an acknowledgement from each Customer by July 29, 2005. This date has now been extended to August 29, 2005.

**The Good News is that WesTelFiber's VoIP service has always included access to E911 Emergency Services for its Customers!**

There are a few situations that could affect your access to E911 Emergency Services, however:

1. A power outage: Our equipment requires power to operate just as a cordless phone or your lights do. To overcome this challenge, we have included a backup battery with your phone system. The backup battery has approximately 5hr of active use.
2. A fiber optic cable cut.
3. (a) If you are a new subscriber, or you have moved to another address, and your service has not yet been activated. (b) If the E911 database used by Emergency Services personnel has not been updated.
4. Force Majeure: An event beyond WesTelFiber's control

**In order to continue providing your VoIP service, you must sign and return your acknowledgement of understanding of these limitations before August 30, 2005.**

We pledge to make every reasonable effort to prevent discontinuing your VoIP service. **Please call us at 1-208-472-8800 if you have any questions or would like a representative to visit you.**

We have also enclosed a set of 6 labels for your convenience. Please place them on or near equipment that you would use to call E911 Emergency Services personnel as a reminder.

Please return the attached Acknowledgement to us **immediately** in the stamped self-addressed envelope. Thank you for your business!

Respectfully,

The WesTelFiber Team.

# VoIP SERVICE LIMITATION

## ACKNOWLEDGEMENT OF UNDERSTANDING

I, \_\_\_\_\_  
(Please print)

residing at \_\_\_\_\_  
(Please print)

hereby acknowledge and accept that my family's access to E911 Emergency Service personnel using our Voice over Internet Protocol (VoIP) service, provided to us by WesTelFiber at the above location, may not be available in all situations. Those situations include but are not necessarily limited to; power outages, cable cuts, delays in updating the E911 database, and events beyond control of WesTelFiber or E911 Emergency personnel.

Telephone Number(s)

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\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**NOTICE! PLEASE READ!**  
**ACCESS TO E911**  
**EMERGENCY SERVICES**  
**LIMITATIONS**

Access may be limited or denied  
if there is a power outage, cut  
cable, Force Majeure event or  
delayed location information  
update to the E911 database